

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

In re: Mortgage Foreclosure Cases

Misc. No. 11-mc-88-M-LDA

**THE DEFENDANTS' RESPONSE TO THE COURT'S REQUEST FOR COMMENTS IN
THE AUGUST 16, 2011 ORDER**

The defendants to the cases assigned to the *In re: Mortgage Foreclosure Cases* Master Docket submit the following notification and comment in response to the Court's August 16, 2011 Order.

1. The Defendants' Liaison Counsel

In accordance with the Court's August 16, 2011 Order, the defendants designate the following individuals as their liaison counsel for administration of the cases assigned to the *In re: Mortgage Foreclosures Cases* Master Docket:

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2. The Defendants' Response to the Court's Consideration of Appointing a Master pursuant to Fed. R. Civ. P. 53

The defendants recognize that a Master could be useful to handle issues related to discovery should the cases on this Master Docket proceed beyond motions to dismiss filed under Fed. R. Civ. P. Rule 12. For the time being, however, no exceptional conditions or circumstances exist and no specific tasks have been identified by the Court or the parties that warrant the appointment of a Master. If the Court decides that a Master could be useful for these cases, the defendants recommend the following individual:

Mark A. Pfeiffer, Esq.
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Respectfully submitted,

Defendants' Liaison Counsel

/s/ Maura K. McKelvey

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Dated: September 9, 2011

CERTIFICATE OF SERVICE

I, Maura K. McKelvey, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 9, 2011.

/s/ Maura K. McKelvey